

# **EXHIBIT 6**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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JORDAN ROY and JUSTIN TRUMBULL, on behalf of themselves and others similarly situated,	:	
	:	
	:	CIVIL ACTION NO. 3:17-cv-30116
Plaintiffs,	:	
v.	:	
FEDEX GROUND PACKAGE SYSTEM, INC.,	:	
	:	
Defendant.	:	
	:	

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**PLAINTIFF JORDAN ROY'S RESPONSES TO DEFENDANT FEDEX GROUND'S  
FIRST SET OF INTERROGATORIES**

Plaintiff Jordan Roy hereby responds to the interrogatories propounded by Defendant FedEx Ground Package System, Inc. (“FedEx”). Roy reserves his right and will meet his obligation to supplement his responses if and when necessary.

**GENERAL OBJECTIONS**

Roy's responses to these interrogatories are subject to the General Objections set forth below. These objections are incorporated into the response to each and every interrogatory and are set forth in this manner to avoid duplication and restatement. For the purpose of clarity, the responses to certain Interrogatories may refer specifically to one or more General Objections. The failure to incorporate specifically a General Objection into a response, however, is not a waiver of the General Objection.

1. Roy objects to each interrogatory to the extent that it seeks information subject to a privilege, including without limitation the attorney-client privilege.
2. Roy objects to each interrogatory to the extent it contains vague, ambiguous, undefined,

**OBJECTION AND RESPONSE TO INTERROGATORY NO. 13:** Plaintiff objects to this interrogatory as an improper inquiry into attorney work-product. Plaintiff further objects to this interrogatory as premature given that discovery has not yet been completed in this case.

**INTERROGATORY NO. 14:**

Please identify the Classwide Proof on which you intend to rely to support your contention that every member of the proposed class was not compensated overtime pay.

**OBJECTION AND RESPONSE TO INTERROGATORY NO. 14:** Plaintiff objects to this interrogatory as an improper inquiry into attorney work-product. Plaintiff further objects to this interrogatory as premature given that discovery has not yet been completed in this case.

**INTERROGATORY NO. 15:**

Please state the dollar amounts you seek individually and on behalf of the proposed class, including, without limitation, any allegedly wrongfully withheld or diverted wages, statutory or liquidated damages, and any other categories of damages, including how you calculated such damages.

**OBJECTION AND RESPONSE TO INTERROGATORY NO. 15:** Plaintiff objects to this interrogatory as an improper inquiry into attorney work-product. Plaintiff further objects to this interrogatory as premature given that discovery has not yet been completed in this case.

**INTERROGATORY NO. 16:**

Identify all facts and evidence supporting your contention that FedEx Ground's alleged conduct was willful, and specify the "willful" conduct you attribute to FedEx Ground.

**OBJECTION AND RESPONSE TO INTERROGATORY NO. 16:** Plaintiff objects to this interrogatory to the extent it seeks information in FedEx Ground's possession, custody, or control. Plaintiff further objects to this interrogatory as premature given that discovery has not yet been completed in this case.

**INTERROGATORY NO. 17:**

Identify all facts and evidence that any SP's alleged conduct in not paying you overtime wages was willful, and specify which "willful" conduct you attribute to which SPs that directly employed you. If you do not attribute any "willful" conduct to some or any SP that employed you, please explain why.

**OBJECTION AND RESPONSE TO INTERROGATORY NO. 17:** Plaintiff objects to this interrogatory to the extent it seeks information in FedEx Ground's possession, custody, or control. Plaintiff further objects to this interrogatory as premature given that discovery has not yet been completed in this case.

AS TO ALL ANSWERS,

The foregoing answers are true and accurate to the best of my knowledge. Signed under  
the pains and penalties of perjury this 20<sup>th</sup> day of December, 2019.



Jordan Roy

AS TO ALL OBJECTIONS,

Dated: December 20, 2019

By his attorneys,

/s/ Michelle Cassorla

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was served by electronic mail and first-class mail on December 20, 2019, on counsel for Defendant:

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/s/ Michelle Cassorla

Michelle Cassorla